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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:17-cr-00400-HZ

v.

JASON PAUL SCHAEFER,

Defendant.

**GOVERNMENT'S NOTICE OF
OBJECTION TO SELECTED
DEFENSE EXHIBITS**

The government objects to the following exhibits:

Exhibits 505 and 520. The government objects to including the arrest and indictment from the Washington County case pending against defendant. These documents include the state charges against defendant, and the documents are not relevant to the current federal charges.

Meanwhile, the risk for prejudice is high, because the jury may be confused by the existence of the state charges for the same offense and improperly speculate as to why defendant faces charges in Washington County for the same conduct. None of the witnesses in this trial drafted these documents; and the Court has been provided with any existing notes related to the testimony of the witnesses in the grand jury. Therefore Exhibits 505 and 520 should be excluded.

Exhibits 511 and 512. The government notes that these proposed exhibits include documents related to the encounter with defendant on April 2017 at Teal Boulevard that the Court has excluded at this time as not qualifying under FRE 404(b).

Exhibit 519. The government objects to the inclusion of the electronic communication related to how the FBI learned of the defendant's purchases from an online retailer. The document appears to be hearsay, and the author of this communication will not be a witness at trial. Moreover, the communication itself references the encounter with defendant on April 2017 at Teal Boulevard that the Court has excluded at this time. Finally, the evidence will be cumulative of other witnesses who will testify to the events that led the FBI to secure a search warrant for defendant's residence.

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Exhibit 518. Finally, the government has proposed, and provided to the defense, a redacted version of Task Force Officer Jeremy Chedester's medical records, which is consistent with the Court's ruling at the pretrial conference on April 29, 2019.

Dated: May 1, 2019.

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

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/s/ Natalie Wight
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